

# **Exhibit A**

**AFFIDAVIT OF MOMODOU TAAL**

I swear under penalty of perjury that the following is true and correct:

1. My name is Momodou Taal, I am a graduate student at Cornell University and I reside in Tompkins County, New York.
2. During my time at Cornell, I have established myself as a scholar, authoring academic articles, serving as a panelist at conferences and giving interviews to the media on various subjects in which I am an expert. I am also an outspoken critic of U.S. foreign policy, particularly regarding military and financial support for Israel. I have criticized various U.S. presidential administrations including that of Joe Biden and Donald Trump, as well as various elements of American history and culture which I believe contribute to inequality and oppression. I consider the actions of the Israeli government against the Palestinian people to constitute a genocide. I base this view on what has been documented and found by various international organizations, including but not limited to the International Criminal Court and the International Court of Justice. As per The United Nations special committee, "Israel's warfare methods in Gaza consistent with genocide, including use of starvation as weapon of war"
3. In addition to my criticism of the state of Israel, I am on record criticizing various governments that include: Governments of African and Arab majority populations and my own Government in the United Kingdom for their oppressive practices and policies, my criticism is not targeted at a particular group of people but upholding the dignity of human beings.
4. As a result of the executive orders, I have been forced to change my prior speech and alter my patterns of interpersonal interaction. I have refrained from attending protests and

public political meetings, I have self-censored what I post on social media, and I no longer discuss politics with some associates from Cornell for fear that my words will be misinterpreted and reported to the government for deportation or criminal prosecution. I am fearful that I may be subject to arrest by immigration officials or police as a result of his speech. I am intensely aware that I am a target as a result of public statements by groups like Betar targeting me personally, as well as general attacks on democratic rights and pro-Palestinian speech by Donald Trump and his spokespersons.

5. As a result of the executive orders in question here, I began withdrawing from broader forms of public engagement, locking my X account and canceling speaking engagements and declining invitations to participate in public events, even though these were opportunities that had previously been integral to my advocacy work and professional development.
6. Of particular significance to me personally is the fact that I was forced to cancel travel to international an event hosted by Queens University in Toronto, Ontario to speak at the launch of my first book, *The Malcolm Effect: Revisited*. The event took place on February 27, 2025, but I was unable to attend for fear of being unlawfully detained upon re-entry. For many years I have looked forward to the possibility of authoring a book and being recognized at a book launch, and I feel robbed by the fact that I was not able to appear in person to talk directly to individuals about my book and its contents.
7. I also fear being subjected to criminal prosecution as a result of the two executive orders in question here. I don't know what type of speech might constitute a violation of either, and I worry even about interacting with my friends and fellow activists for fear of putting myself and my friends at risk of deportation or criminal prosecution.

8. I feel that I have been irreparably harmed by the executive orders.
9. This ordeal has affected me considerably and it is causing undue stress to my family and friends in the United Kingdom and in The Gambia, who want nothing more than to see me graduate. With all things being equal, my preference would have been to finish my Ph.D. and continue my work as a scholar who works on political-economy and sovereignty.

Signed,  
*momodou taal*

Date: 14 March 2025